



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JUL 02 2010

REPLY TO THE ATTENTION OF:

E-19J

Stephen J. Kuennen, District Ranger
Laurentian Ranger District
Superior National Forest
318 Forestry Road
Aurora, Minnesota 55705

Re: Tracks Project Draft Environmental Impact Statement, Laurentian Ranger District,
Superior National Forest, St. Louis and Lake Counties, Minnesota
CEQ No. 20100177

Dear Mr. Kuennen:

The U.S. Environmental Protection Agency has reviewed the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (EIS) for the above-mentioned project. Our review is pursuant to the National Environmental Policy Act, the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The purpose for the proposed project is to implement land management activities consistent with the direction of the adopted Superior National Forest Land and Resource Management Plan (Forest Plan). Proposed management activities will address gaps between desired future conditions as stated in the Forest Plan and current project area conditions. Project objectives include:

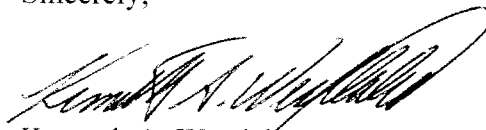
- Improve spatial patterns by creating young forest adjacent to recently-harvested areas, thereby maintaining existing large-sized mature patches;
- Create young forest and improve the structure and within-stand species diversity through vegetation management activities (i.e., harvest, planting, burning, and mechanical site preparation);
- Reduce hazardous fuels in the Brimson and Toimi areas through vegetation management;
- Maintain or improve habitat conditions for wildlife species;
- Improve water quality and riparian habitat by removing old dams; and
- Provide a transportation system that meets long-term transportation needs.

The Draft EIS documents analysis of a No Action alternative plus three action alternatives. The three action alternatives are designed to move the vegetation within the Tracks project boundary toward desired conditions as detailed in the Forest Plan. The action alternatives would increase young upland forest and decrease mature and older upland forest habitat. Management-induced edge would decrease due to harvest and the creation of larger-sized patches of young forest. The proposed action, Alternative 3, proposes the largest increase in young forest type and the conversion of a larger number of acres from aspen/birch to jack pine, compared to the other action alternatives.

Based on our review, we have assigned a rating of "Lack of Objections" to this Draft EIS because the three action alternatives address the purpose and need and are consistent with the Forest Plan. Nevertheless, we recommend the Final EIS include language to substantiate a statement in the Draft EIS that adequate amounts of older habitat will remain for the suite of species that utilize older habitat if any of the action alternatives would be implemented (see Section 3.7.6 Environmental Consequences (pg. 3-47)). A discussion relating this statement back to Forest Plan goals for older habitat and the suite of species that use this habitat would be beneficial.

Please send one copy of the Final EIS and Record of Decision to my attention once it becomes available. Should you have any questions regarding the contents of this letter, please do not hesitate to contact me or Kathy Kowal at (312) 353-5206 or via email at kowal.kathleen@epa.gov. A summary of the rating system used in the evaluation of this document is enclosed for your reference.

Sincerely,



Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosure

cc: Jim McDonald, Regional Environmental Coordinator